

STATE OF LOUISIANA

PARISH OF CADDO

AFFIDAVIT OF JOHN W. DEAN

BEFORE ME, the undersigned Notary Public, personally came and appeared **JOHN W. DEAN**, an individual of lawful age, to me known, who upon being duly sworn, declared as follow:

1.

I provided an Expert Report, dated August 28, 2019 (“Expert Report”) on behalf of Barbara Marie Lollar in the matter styled *Magnolia Island Plantation, LLC and Barbara Marie Carey Lollar v. Lucky Family, LLC, W.A. Lucky, III, and Bossier Parish Sheriff Julian C. Whittington*, Case Number 5:18-cv-01526 in the United States District Court in the Western District of Louisiana, Shreveport Division (the “Litigation”).

2.

I have been provided with copies of two Daubert Motions seeking to exclude my opinion and testimony as filed by both W.A. Lucky, III and Lucky Family, L.L.C. in the Litigation (collectively, the “Lucky Daubert Motions”).

3.

The Lucky Daubert Motions make the representation that I believed Mr. Lucky’s appraiser, Mr. Patrick Lacour, used the appropriate methodology in performing his appraisal. This affidavit is submitted to clarify that my Expert Report’s agreement as to a basic methodology used by Lacour was limited to his use of a worksheet format to apply discounts to a base yield. This was certainly not an approval of how Mr. Lacour utilized this format or the inputs which he employed.

4.

Further, my Expert Report states that Mr. Lacour’s application of the methodology employed was “significantly flawed.” The errors and reliability issues with Mr. Lacour’s work which I presented in my Expert Report are not mere minutia, but are core issues which indicates the lack of any reasonable basis for the calculation of value expressed in the Lacour report.

5.

I am submitting this Affidavit for use in the Plaintiffs’ opposition to the Lucky Daubert Motions in order to ensure my Expert Report is not construed as approving Mr. Lacour’s overall methods or inputs to reach his conclusions.

[SIGNATURE ON NEXT PAGE]

Further Affiant sayeth naught.



JOHN W. DEAN

SWORN TO AND SUBSCRIBED before me, Notary Public, on this 3 day of April, 2020.



NOTARY PUBLIC

KATHERINE ANNETTE ROGERS
Notary Public Caddo Parish, LA
My Commission Expires with Life
40955